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August 15, 2014

Mr. Jim Marshall
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

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SACRAMENTO
CVRWQCB

**SUBJECT: COMMENTS TO TENTATIVE ORDER AMENDING WASTE DISCHARGE REQUIREMENTS
FOR SACRAMENTO-SAN JOAQUIN DELTA DISCHARGERS**

Dear Mr. Marshall,


Ironhouse Sanitary District has reviewed the Tentative Order Amending Waste Discharge Requirements for Sacramento-San Joaquin Delta Discharges and has the following comments:

1. The Regional Monitoring Program (RMP) should be finalized before amending the Waste Discharge Requirements. It is difficult to provide meaningful comments to the proposed Amendment.
2. ISD does not currently perform any monthly receiving water monitoring. ISD's NPDES permit only requires checking of temperature at the DWR Jersey Point monitoring station on-line. Only monitoring ISD will perform is quarterly sampling of the river and effluent in year 3 or 4 of the permit cycle. Basically for 4 out of the 5 permit years ISD does not incur any receiving water monitoring costs. ISD's participation in the RMP will be all cost dependent.
3. Attachment I, paragraph 2.VIII, first paragraph, second sentence: Who determines if the part of the receiving water monitoring a discharger chooses to conduct is reasonable and acceptable?
4. Attachment I, paragraph 2.VIII, third paragraph, first sentence: If the RMP is not intended to be used directly to represent either upstream or downstream water quality for purposes of determining compliance with this Permit, does it mean the discharger must still perform upstream and downstream water quality monitoring, if required in their permit?
5. Attachment I, paragraph 2.VIII, third paragraph, second sentence: If the RMP identifies water quality issues needing further evaluation, who is the responsible party to do this further evaluation?

6. Attachment I, paragraph 2.VIII, fourth paragraph: This paragraph is contradictory and needs to be clarified. The paragraph first states, "During the period of participation in the Delta Regional Monitoring Program, the Discharger shall continue to report the individually conducted receiving water monitoring data..... The paragraph then goes on to state, "....cover letter shall state that the discharger is participating in the Delta Regional Monitoring Program in lieu of conducting the individual receiving water monitoring program required by the permit. "
7. Attachment I, paragraph 3.D.1.b: Why is the Tentative Amendment referencing to ISD's 2008 permit and not the current 2013 permit? Reference to the 2013 permit language is more appropriate.

Sincerely,

IRONHOUSE SANITARY DISTRICT

A handwritten signature in black ink, appearing to read "Jennifer Skre".

Jennifer Skre

District Engineer